



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
COMPLIANCE AND ENFORCEMENT

APR 29 2011

Reply To: OCE-127

CERTIFIED MAIL NUMBER 7010 2780 0000 2171 9959
RETURN RECEIPT REQUESTED

Simpson Tacoma Kraft Company, LLC
c/o Betsy G. Stauffer
917 East 11th Street
Tacoma, Washington 98421

Re: Requirement to Provide Information Pursuant to Section 114 of the Clean Air Act

Dear Sir or Madam:

The enclosed Information Request is being issued to you pursuant to Section 114 of the Clean Air Act (CAA or the Act), 42 U.S.C. § 7414. The U.S. Environmental Protection Agency requests information concerning Simpson Tacoma Kraft Company, LLC's facility in Tacoma, Washington ("the Facility").

Section 114 of the CAA authorizes EPA to request and require the submission of records, reports, and other information to carry out the provisions of the Act and to determine whether any violations of the Act have occurred. In accordance with this authority, you are hereby served the enclosed Information Request. You are required to provide the requested responses to Enclosure 2 within sixty (60) days of your receipt of this Information Request. Please submit your written responses to:

Katie McClintock
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900, OCE-127
Seattle, Washington 98101-3140

We also ask that you complete and sign the enclosed statement of certification to ensure the response you submit to EPA to this Information Request is true, accurate and complete.

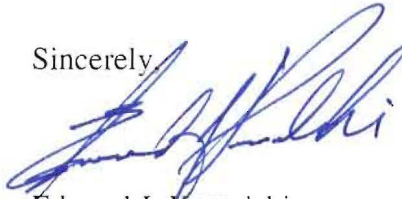
Failure to provide the required information in a timely manner may lead to a civil action to obtain compliance, or to recover a civil penalty of not more than \$37,500 per day for each violation, or both, in accordance with Section 113 of the CAA, 42 U.S.C. § 7413. EPA also has authority under Section 113 to seek criminal penalties against any person who knowingly makes any false statement, representation, or certification in any document required pursuant to the CAA. Even if you fully respond to this Information Request, you may still be subject to an administrative, civil, or criminal action as provided by the CAA.

You are entitled to assert a claim of business confidentiality, covering all or any required information, in the manner described at 40 C.F.R. § 2.203(b). Note that emission data, which includes information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of emission data, are not entitled to confidential treatment. Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth at 40 C.F.R. Part 2, Subpart B. Unless a confidentiality claim is asserted in the manner described at 40 C.F.R. § 2.203(b) at the time the required information is provided, EPA may make this information available to the public without further notice to you.

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §§ 3501, et seq.

For technical questions regarding this Information Request, or to discuss whether additional time may be necessary to provide complete responses, please contact Katie McClintock at (206) 553-2143. For legal matters contact Shirin Venus, Assistant Regional Counsel, at (206) 553-4194.

Sincerely,



Edward J. Kowalski
Director

Enclosures

cc: Plant Manager,
Simpson Tacoma Kraft Company, LLC

Stuart Clark,
Washington State Department of Ecology

Garin Schrieve,
Washington State Department of Ecology

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

IN THE MATTER OF:)
)
Simpson Tacoma Kraft Company, LLC)
Tacoma, Washington) CERTIFICATION OF COMPLETE RESPONSE
)
)
)

Dated: _____ Signature: _____

Title: _____

ENCLOSURE 2
Simpson Tacoma Kraft Company, LLC
Tacoma, Washington
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Section 1 – Instructions and Definitions

Instructions

1. Provide responses to the Questions in Sections Two through Five for the Simpson Tacoma Kraft Company, LLC's Facility located at 801 Portland Avenue, Tacoma, Washington. Provide a separate narrative response to each question and subpart of the question set forth in this Information Request and precede each answer with the number of the question to which it corresponds.
2. For all questions, provide a detailed explanation of your answer with copies of any information or data relied upon in the calculation (if the information used is a source test, you may simply reference the date of the test).
3. If the information requested in response to a question has been provided in response to another question in this Information Request, you may reference that answer instead of providing redundant copies.
4. If a time period is not specified for a question, provide the answer from 1990 to the Present.
5. If information requested does not exist, affirmatively state so and explain why.
6. "In All Relevant Units of Measurement" – For questions where answers are requested in "All Relevant Units of Measurement" provide answers in all units of measurement that are relevant, using the following illustrations:
 - a. For all emissions, provide results in pound per hour, pounds per ton, grains per dry standard cubic feet (for particulate matter), and parts per million (ppm) for gaseous pollutants.
 - b. For fuel use (including black liquor solids) provide both the quantity of fuel [million feet cubed (mmft³), thousand gallons (kgal), tons of black liquor solids (TBLs), Oven Dried Tons (ODT)] and the heat value of that fuel in British Thermal Units (BTUs).
 - c. For lime kilns, provide production and emissions with respect to tons of calcium oxide (CaO) and Tons of Air Dried Pulp (TADP).
 - d. For Smelt Dissolving Tank Vents (SDTV) and Recovery Boilers, include production and emissions with respect to Black Liquor Solids (BLS) and TADP.

Definitions

The following definitions shall apply to this Information Request. All terms used in the Information Request, but which are not specifically defined here, shall have their ordinary meaning or the meaning that is common in the industry.

1. "Simpson" or "you" means Simpson Tacoma Kraft Company, LLC, and includes its officers, employees, agents, contractors, and consultants.
2. "Current Unit(s)" means any Unit that is in operation or is able to be operated at the time of receipt of this letter. If a Unit is temporarily shut down at the time of receipt of this letter but you plan to operate it again, include this Unit as part of the Current Units group but specify its current status.

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3. "Document(s)" shall mean any object that records, stores, or presents information, and includes writings, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hard copy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include: (a) any copy of each document which is not an exact duplicate of a document which is produced, (b) each copy which had any writing notation, or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every other document referred to or incorporated into each document.
4. "Former Unit(s)" means any Unit that has operated at the Facility for more than six months since 1985 but has been permanently decommissioned (is no longer able to operate). Former Units, for the purpose of this request only includes units that had actual annual emission of more than 1 ton per year of any Regulated Air Pollutant in any year that the unit was operating.
5. "Modification" – shall have its generally accepted meaning, and not the definition provided by the Clean Air Act, unless the question specifies that the Clean Air Act definition applies.
6. "Normal emissions" shall mean emissions which are usual, typical, or expected. For emissions which will be considered normal exclude periods of maintenance, shutdowns, startups, or malfunctions or any other periods that the plant operator would not consider to be normal.
7. "Present" shall mean the date of your receipt of this Information Request.
8. "Project" – shall mean a physical change or change in the method of operation of a pollution source including maintenance projects, upgrades, and any other changes.
9. "Regulated Air Pollutant" means pollutants that are subject to regulation under the Clean Air Act, but does not include pollutants that are regulated only under 40 C.F.R. § 98.2.
10. "Unit" means an activity and piece of equipment that emits or has the potential to emit a regulated air pollutant.

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Section 2 – New Source Review

1. Provide a detailed narrative description of the current activities at the Facility from the introduction of raw material sequentially through to completion of final products, describing each air emissions Unit in relation to the process. In the narrative, describe the function of each Unit and describe in detail the chemical or physical process occurring at each stage of the process. Also provide a schematic of the Facility and provide a legend to tie this schematic to the narrative description.
2. List all Current Units.
3. List all Former Units.
4. Provide the following information for each Current Unit and Former Unit. For the Former Units, describe the state of the equipment as it existed prior to being decommissioned.
 - a. A description of the activity including a description of the emissions and the function of the activity in relation to the plant. Include activities associated with each Unit, such as any conveyer, storage pile, and any other emission producing component of the Unit. If the activity has variable emissions, such as soot blowing, explain the general frequency of these activities and include these activities in estimating emissions in the later parts of this question.
 - b. The maximum and average hourly and annual input (by raw material, including steam) and output (by product/heat/steam, etc) from the Unit.
 - c. The maximum and average hourly and annual amounts of each fuel consumed by each activity in the physical units of fuel (ft³, gal, ODT), and the heat value (BTUs).
 - d. A list of the air pollutants the Unit has the potential to emit.
 - e. A classification of the emissions from each activity as fugitive or non-fugitive and an explanation of the determination.
 - f. A description of any air pollution capture and control systems that capture emissions from the Unit.
 - g. A calculation of the potential to emit of the source (in hourly and annual units) from each Unit for each regulated New Source Review (NSR) pollutant as defined in 40 C.F.R. § 52.21 (b) (50) and an explanation of the calculation and any assumptions made in the calculation. Include a copy (or a reference to a copy provided under a different part of this Request) of all of the underlying data or sources of the assumptions (including monitoring records, continuous emission monitoring System (CEMS) data, and summaries of source test reports) that support your calculations.
 - h. If the potential to emit of the Unit has changed between 1985 and today, provide a calculation of the potential to emit on an annual basis each year since 1985.
 - i. A calculation of the current Normal Emissions (in hourly and annual units) from each Unit and an explanation of the calculation and any assumptions made in the

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calculation. If emissions from the unit are controlled through the use of process controls or an add-on air-pollution control device, include the effect of these controls in the calculation of Normal Emissions. Provide a copy (or a reference to a copy provided under a different part of this Request) of all of the underlying data (including monitoring records, CEMS data, and summaries of source test reports) that supports the calculation. Provide emissions estimates in concentration, rate, and All Relevant Units of Measurement.

- j. Provide explanations for the emissions calculations provided in response to parts (g), (h), and (i) of this question, and provide the following information.
 - i. If the calculations provided in response to question 4(g), (h), and (i) above rely on a generic emission factor and not a source test when source test results for that or a similar Unit at the Facility exist, provide an explanation of your basis for using the generic emissions factor.
 - ii. If there are other Units at the plant but you do not think they are similar enough to use emissions data, explain the differences and why the emissions results would not be representative.
 - iii. If your calculations rely on a single source test when there are multiple test results available (for the Unit or similar units at the Facility), explain the basis for using the selected data and provide any data necessary to support the explanation.
 - k. If the Unit is subject to a limit under state or federal law, list the limit and explain how the emissions estimate in question 4 (g), (h), and (i) is consistent with these limits.
5. For all Former Units, provide the following:
- a. The date the Unit was taken out of operation.
 - b. The date physical changes were made that would permanently remove the Unit from operation.
 - c. The date you notified the local permitting agency that the Unit was shut down.
 - d. The date you asked for the Unit to be removed from the permit.
6. Provide a list of each air pollution control device currently in operation and include the following information for each device.
- a. A description of the device, including but not limited to the vendor, size, and related control efficiency.
 - b. A description of which Unit(s) are controlled by the control device.
 - c. The date the device was installed and the date it began operation.
 - d. Whether the control device was installed to address a specific regulatory requirement (describe the requirement- e.g., MACT, NSPS) or if it was installed on a voluntary basis.

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- e. The vendor guarantee for the control efficiency of the device for each pollutant it affects.
 - f. The dates of each performance test and the summaries from each report from 1970 to Present. The summary should include the emissions data as well as any operational data that was captured in the report.
 - g. A description of all documents in your possession or control regarding the operation and performance of the control device.
 - h. A list of each time period the control device was not in operation since 2000 (or when installed, whichever is later) and the date, the duration in hours, the cause, and corrective action taken in response to each event.
7. For each Current Unit, identify each air pollution control technique currently used and describe which pollutants are controlled or reduced by the technique. In addition, provide the following information.
- a. The date the technique was first implemented.
 - b. The reason the technique was implemented (MACT, voluntary, NSPS, etc.).
 - c. The approximate emission reduction achieved through the technique.
 - d. A copy of any testing, research, or literature demonstrating the emission reduction achieved from the control technique.
 - e. A list of each time period the control technique was not used for more than one continuous month since 2000 (or when installed, whichever is later). Also specify the date, the duration (in hours), the cause, and any corrective action(s) taken in response to each occurrence.
8. For the period between 1990 and the date of this letter, provide the following monthly data for each lime kiln, recovery boiler, power boiler, and hog fuel boiler at the Facility:
- a. Amount of each fuel used (including black liquor solids) and total BTUs of fuel used per month.
 - b. Raw material used per month.
 - c. Unit production per month.
 - d. Unit steam production (in lbs/hr, lbs/BLS, psig, and temperature) per month.
 - e. For the recovery boilers, hog fuel boilers, and power boilers only, the hours of operation of each Unit each month.
9. Has Simpson sent any black liquor solids offsite for processing in the last 10 years? If so, provide the date of each transfer, the total amount transferred, and whether the material was transferred back.
10. For each lime kiln, recovery boiler, power boiler, hog fuel boiler, and paper machine at the Facility, provide an estimate of the following information for each year from 1980 to the Present.

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- a. The maximum and average input (by raw material) and output (by product/heat/steam, etc) from the Unit in both hourly and annual measurements.
 - b. The maximum and average amount of each fuel consumed by each Unit including the physical units of fuel (ft³, gal, ODT), and the heat value (BTU) in both hourly and annual measurements.
11. For each Current and Former Unit, provide the following annual information from 1980 to the Present.
 - a. Production in All Relevant Units of Measurement.
 - b. Raw material usage in All Relevant Units of Measurement, separated by each raw material used (including steam).
 - c. Fuel usage in All Relevant Units of Measurement, separated by each fuel.
12. For each year from 1990 to the Present, provide the following data.
 - a. The annual emissions inventories or other emission reports submitted to the state or local agency pursuant to your operating permit of WAC 173-400-105.
 - b. An annual emissions estimate for each Current Unit and Former Unit.
13. Provide the following information regarding fuel usage for each Current and Former Unit, including any supporting records.
 - a. A list of fuels that each Unit was capable of firing on January 1, 1977.
 - b. A description of how each fuel listed in response to part (a) of this question would have been consumed or processed prior to January 1, 1977. Include a description of the equipment in place in 1977 for fuel delivery, storage, and transfer to the Unit.
 - c. A list of what fuel is currently used and which fuels can potentially be used for each Current Unit taking into account the current equipment and the configuration of that equipment in place today. For each fuel listed, provide a description of the fuel delivery, storage, and transfer to each Unit where it is used.
 - d. For each Unit where a different (new) fuel was used after 1977, list the first day each fuel type was fired.
 - e. For each Unit where a new fuel was added after 1977, a description of what equipment was put in place to facilitate the initial use of the fuel.
 - f. Copies of any correspondence between you and the local and state permitting authority regarding current or past fuel use or determinations by the state about any permitting necessary for the Project.
14. Provide the following for each Continuous Emissions Monitoring System (CEMS) in operation today measuring emissions from a Current Unit.
 - a. A description of the stack where the CEMS is located.
 - b. A list of the Current Units which vent to the stack where the CEMS is located.
 - c. The pollutant that the CEMS measures.

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- d. The date the device was installed and the date it began operation.
 - e. The dates of each Relative Accuracy Test Audit (RATA) conducted along with the summary pages from each test.
 - f. A list of all periods of time greater than one day during which the CEMS was not operating over the last five years. Also provide an analysis for each incident that addresses how long the system was down, a description of the cause of the problem, what was done to fix it, and any action taken to prevent future similar problems, if any.
 - g. The calculation currently used to convert the CEMS concentration data to a rate (lb/hr, etc.), an explanation of the basis for the calculation, and how it was developed. If the calculation has changed since the CEMS was installed, provide the other equation(s) that have been used to convert the CEMS reading to a rate, the period of time each equation was used, and a simple description of the basis for each equation.
 - h. Daily CEMS data from 2008 to Present in an electronic spreadsheet format (e.g., Excel).
 - i. Monthly CEMS data from 1980-2004, when available, in an electronic spreadsheet format.
15. For each Continuous Opacity Monitoring System (COMS) measuring emissions from a Current Unit, provide the following information.
- a. A description of the stack where the COMS is located.
 - b. A list of the Current Units that vent to each stack where the COMS is located.
 - c. The date the device was installed and the date it began operating.
 - d. Monthly COMS data from 2008 to Present in an electronic spreadsheet format.
16. For each Current and Former Unit at the Facility, provide a list of the dates since 1970 for any and all air emissions testing that occurred for nitrogen oxides (NO_x), sulfur oxides (SO₂), particulate matter (PM), including filterable and condensable particulates, carbon monoxide (CO), volatile organic compounds (VOC), total reduced sulfur (TRS), and any other regulated hazardous air pollutant. Emission testing includes, but is not limited to compliance testing, engineering testing, and testing for general information. For each emission test, provide a copy of the summary pages from each report including the emission rates as well as all the operating parameters recorded during the tests such as raw material feed rate, fuel type, sulfur content, firing rate, and production rate. Indicate whether the source test report has been provided to the local and/or state permitting agency.
17. Provide a summary of all source test data provided in response to question 16 in electronic spreadsheet format. In this summary, provide the date of the test, the Unit tested, the result of the source test for each pollutant tested, and all operating parameters recorded during the test such as raw material feed rate, fuel type, sulfur content, and firing rate, and production rate. In all cases where there are multiple ways

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of measuring from the same Unit, provide the results in All Relevant Units of Measurement.

18. Provide a copy of all documents submitted to any trade association since 1990 addressing air pollution, construction Projects, or production estimates/data as part of plant information surveys or annual reports.
19. For each Project at a Current Unit that occurred after 1990 that resulted or had the potential to result in any increase in production or emissions, and all boiler tube replacements, combustion air improvements, black liquor delivery system changes, black liquor concentration changes, and changes in fuel usage (quantity or type), provide the following information:
 - a. The date, in month/day/year format, that the Project commenced and the date the Project first started up.
 - b. A description of the Project.
 - c. The purpose of the Project.
 - d. Any internal documentation about the Project including any capital expenditure requests, justifications, or authorizations, including attachments and addenda.
 - e. A description and quantification of the change in production/steam output, raw material usage, and/or fuel usage resulting from the Project both short term (hourly) and long term (annual). For the purposes of this question, answer about the effect on maximum capacity. Also, answer the following two questions if applicable.
 - i. If the source plans to run at less than maximum short term or long term capacity, also explain what the normal rate is anticipated to be (or for Projects over two years ago, what was the change in production after the change in practice).
 - ii. If the Project allows the affected Unit(s) to operate with fewer shutdowns or reduced maintenance, quantify the increase in production possible and achieved from this reduction.
 - f. An analysis and quantification (including a copy of any data used in producing the answer) of the change in the potential to emit of any Regulated Air Pollutant as a result of the Project. Include an analysis of the change of the emission rate in terms of lb/ton and lb/hr and an analysis of concentration, where applicable.
 - g. An analysis and quantification (including any data used in producing the answer) of the effect of the Project on other upstream or downstream Unitss in terms of demand on the Unit or production required from the Unit to support the Project. If there was an increase in production required from an upstream or downstream Unit to support the Project, quantify the change in emissions (lb/hr and ton/year) that resulted from each Unit for each regulated air pollutant.
 - h. If production has increased since January 1, 1990, at one of the Units modified as part of the Project, but your answer to question 19 (e) concludes that this Project

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did not increase production on those Units, explain why this Project did not cause the increased production.

- i. Explain whether the Project triggered any new regulatory requirements (e.g., NSPS, NSR, MACT, or state rules).
 - j. Was the Project performed or complied in whole or in part during the same year as any other Projects? If yes, list the other Projects and provide an explanation and analysis of the cumulative effect of all of the Projects on production and emissions.
20. For any Project that involves the replacement of some or all boiler tubes in a hog fuel boiler, power boiler, or recovery boiler, provide the following:
- a. A general description of the boiler design after the modification and an explanation of what changes took place. This description shall include, but is not limited to, the drum design (single, bi-drum) and information on whether the generating bank is cross flow or panel type.
 - b. For the tubes that were replaced (regardless of whether they are replaced because they are damaged or whether they need to be removed to access damaged food), provide the following information:
 - i. The location of the tubes replaced in the Unit and the section of the Unit (i.e., generating bank, superheater, etc.).
 - ii. The technical specifications of the tubes prior to the replacement (the volume of the bank tubes (ft³), tube wall thickness (inches), tube configuration, spacing between tubes, and metallic composition and type of tube.
 - iii. The technical specifications of the tubes after the replacement (the volume of the bank tubes (ft³), tube wall thickness (inches), tube configuration, spacing between tubes, and metallic composition and type of tube.
 - c. Provide copies of any engineering studies, engineering documents, simulation techniques, simulation software, mathematical modeling, or any other documents that discuss the projected performance of the boiler after the modification (performance includes, but is not limited to, up-time and availability of the Unit, steam production of the Units, fuel consumption of the Units, projected fouling).
21. For each Project at the Facility since January 1, 1990, that exceeded \$100,000 in cost (and is not already included in your response to question 19), provide the following information.
- a. The date (in month/day/year format) that the Project commenced and the date the modified Unit(s) were first started up.
 - b. A brief description of the Project.
 - c. A quantification of the effect of the Project on production and emissions of the modified Unit and any upstream or downstream equipment.
 - d. The cost of the Project.

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22. If either raw material throughput or production has increased on an actual or potential basis for any of the Current Units, and is not accounted for by your answer to questions 19-21, provide the date of the increase, a description and quantification of the increase, and explain what enabled the Unit to increase production.
23. Submit copies of any studies of Projects intended to increase either the raw material inputs to, or the production output from, any Unit since 1990.
24. Provide copies of any New Source Review or Prevention of Significant Deterioration analyses which were conducted with respect to a proposed or actual modification/Project at the Facility since January 1, 1990. This request includes, but is not limited to, any studies conducted by Simpson and any analyses sent to a state, local, or federal air permitting authority.
25. Provide copies of all correspondence between any state, local, or federal air permitting authority and you regarding the installation or modification of any emitting Unit. For purposes of this question, "correspondence" includes, but is not limited to, applicability determinations, Notice of Construction applications, and approval orders.
26. Provide a copy of any internal future capital outlay plan which describes possible future Projects to be conducted at the facility within the next five years.

Section 3 – Mandatory Greenhouse Gas Reporting Rule

27. Is the Facility required to report its greenhouse gas emissions pursuant to 40 C.F.R. § 98.2 of the Mandatory Greenhouse Gas Reporting Rule? (Note: for purposes of this question the definition of "Facility" provided at 40 C.F.R. § 98.6 shall apply.) In your response to this question you are not required to provide data that are the inputs to emissions equations deferred from reporting pursuant to the Interim Final Regulation Deferring the Reporting Date for Certain Data Elements Required Under the Mandatory Reporting of Greenhouse Gases Rule. See 75 Fed. Reg. 81338 (Dec. 27, 2010).
 - a. If no, explain the basis for your determination and include a complete description of the methods used to calculate your greenhouse gas emissions for purposes of determining applicability of 40 C.F.R. Part 98. Provide a description of all data and assumptions used in such calculations, and any records that substantiate the use of the data and assumptions relied upon in your calculations.
 - b. If yes:
 - i. Identify the subpart(s) of 40 C.F.R. Part 98 that you have determined apply to the Facility;
 - ii. Provide a list of all the sources at the Facility that are subject to 40 C.F.R. Part 98.
 - iii. Where applicable, provide any records of calibration of monitoring equipment used to estimate or measure the Facility's greenhouse gas emissions.

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Section 4 – New Source Performance Standards (NSPS)

28. For each “affected facility” as defined in 40 C.F.R. § 60.280, provide the following information.
- a. A list of each Unit that meets the definition of an “affected facility.”
 - b. List the date(s) each Unit listed in response to (a) was installed, and any Project on or affecting the Unit that took place after September 24, 1976.
 - c. For each Project described in (b) of this question, provide a description of each Project and a calculation of the actual emissions increase from the Project.
29. List all Kraft pulp mill digester system, brown stock waster system, multiple-effect evaporator system, recovery furnace, smelt dissolving tank, lime kiln, and condensate stripper system Units that have experienced an increase in production or throughput since September 24, 1976, but which were not listed in your answer to question 28. Provide the date of the increase, the amount of the increase, the capital expenditure requests of the Project, and explain why or how the change caused a throughput increase.
30. Provide copies of all documents that you prepared and/or submitted to a local agency, state, or EPA to demonstrate compliance with the requirements of 40 C.F.R. § Part 60, Subpart BB since 1995. This includes, but is not limited to, initial performance test results, excess emissions reports, calibration reports, CEMS summary reports, and maintenance information.
31. For each “affected facility” (as defined in 40 C.F.R. § 60.40), provide responses to (a) through (d) of question 28.
32. Provide copies of all documents that you prepared and/or submitted to the local agency, state, and EPA to demonstrate compliance with 40 C.F.R. Part 60, Subpart D. This includes, but is not limited to, the initial performance test results, excess emissions reports, calibration, and maintenance information.

Section 5 – Maximum Achievable Control Technology (MACT)

MACT Questions - 40 C.F.R. Part 63, Subpart S

Kraft Pulping System

33. For the closed-vent system used to collect Low Volume High Concentration (LVHC) gases at the Kraft mill, provide the following.
- a. List each enclosure opening or hood opening and describe its closure mechanism.
 - b. List all components of the closed-vent system that are operated at positive pressure and located prior to a control device.
 - c. List each bypass line that could divert vent streams containing Hazardous Air Pollutant (HAP) to the atmosphere and indicate whether the bypass line is computer-controlled.
 - d. Provide a diagram or schematic of the LVHC closed-vent system, including the components listed in response to (a) through (c) of this question.

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- e. For the period from January 1, 2009, to the Present, provide copies of reports documenting monthly visual inspections required under 40 C.F.R. § 63.453(k)(2).
 - f. For any instances in which a defect in the closed-vent system was identified, describe and provide documentation of all repair efforts made and corrective actions taken. Identify the date the defect was discovered and the dates of repair efforts and corrective actions.
34. For the closed-vent system used to collect High Volume Low Concentration (HVLC) gases at the Kraft mill, provide the following.
- a. List each enclosure opening or hood opening and describe its closure mechanism.
 - b. List all components of the closed-vent system that are operated at positive pressure and located prior to a control device.
 - c. List each bypass line that could divert vent streams containing HAP to the atmosphere and indicate whether the bypass line is computer-controlled.
 - d. Provide a diagram or schematic of the HVLC closed-vent system, including the components listed in response to parts (a) through (c) of this question.
 - e. For the period from January 1, 2009, to the Present, provide copies of reports documenting monthly visual inspections required under 40 C.F.R. § 63.453(k)(2).
 - f. For any instances in which a defect in the closed-vent system was identified, describe and provide documentation of all repair efforts made and corrective actions taken. Identify the date the defect was discovered and the dates of repair efforts and corrective actions.
35. For each enclosure opening or hood opening listed in response to questions 33(a) and 34(a), provide the following information for the time period from July 1, 2008, to the Present.
- a. Copies of reports documenting monthly visual inspections of the closure mechanism required under 40 C.F.R. § 63.453(k)(1).
 - b. Documentation of annual demonstrations that the enclosure opening or hood opening was operated under negative pressure required under 40 C.F.R. § 63.453(k)(4).
 - c. Documentation of all repair efforts made or corrective actions taken after any instances in which you discovered that an enclosure opening was not operating under negative pressure. Identify the dates of discovery and the dates of all repair efforts and corrective actions.
36. For each positive-pressure component of the closed-vent system listed in response to questions 33(b) and 34(b), provide the following from the time period from January 1, 2009, to the Present.
- a. Documentation of annual demonstrations that the system was operating with no detectable leaks.

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- b. For each time that an instrument reading of 500 parts per million by volume (ppmv) or greater above background was measured, the date that the reading was taken. Also include documentation of all repair efforts made or corrective actions taken, including the dates of these actions.
37. For each computer-controlled bypass line listed in response to questions 33(c) and 34(c), provide the following information.
- a. Provide documentation of each time the flow indicator was calibrated since its installation, including the dates and results of each calibration.
 - b. For the period from January 1, 2009, to the Present, provide data recorded by the flow indicator showing the presence or absence of gas stream in the bypass line. Data points should be reported at a frequency of at least once every 15 minutes, and provided in electronic spreadsheet form.
38. For each bypass line valve listed in response to questions 33(c) and 34(c) that is not computer-controlled, provide copies of reports documenting monthly visual inspections to ensure that the valve is maintained in the closed position, as required by 40 C.F.R. § 63.453(k)(5) for the time period from January 1, 2009, to the Present.
39. Provide a list of all points within the Kraft pulping system where uncaptured process air emissions vent to the atmosphere. Provide a diagram or schematic indicating the location of these emission points.
40. For the time period from January 1, 2009, to the Present, identify the date, time, and duration of each instance when LVHC was controlled in any Unit (specify the specific Unit for each instance).
41. For the time period from January 1, 2009, to the Present, provide continuous monitoring data for the thermal oxidizer combustion temperature. Provide the data at the originally recorded frequency, and by 12-hour block average values. Submit the data in an electronic spreadsheet format.
42. For the period from January 1, 2009, to the Present, identify the dates, times, and periods of duration when flash steam was used in the Kraft mill's chip bin for pre-steaming.
43. Provide the dates and results of all source tests in which the uncontrolled gaseous emissions from any of the Kraft pulping system components were measured, including, but not limited to, characterization of the emissions from the following: the LVHC and HVLC systems and their components, knotters, screeners, pulp washing systems, and oxygen delignification systems.
44. Provide the dates and results of all source tests that measured the HAP content of decker system process water.

Pulping Condensate System

45. List all points in the Kraft process at which pulping condensates are collected for transfer to the foul condensate tank (stripper feed tank).

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46. List all points in the Kraft process at which pulping condensates are collected for transfer to the combined condensate tank.
47. List all points in the Kraft process at which pulping condensates are not collected pursuant to 40 C.F.R. § 63.446 and indicate the fate of these condensates (e.g., sewerage).
48. For each parameter or value that is directly and continuously monitored in order to determine compliance with 40 C.F.R. § 63.446 (i.e., the requirements for collection and control of Kraft pulping process condensates), provide the monitored values, the frequency at which they are recorded, for the time period from January 1, 2009, to the Present. Submit the data in an electronic spreadsheet format.
49. For the time period from January 1, 2009, to the Present, provide the following data in an electronic spreadsheet format. For each data element below, provide a sample calculation showing the relationship between the value in question and the parameters that are directly monitored.
 - a. Daily Kraft pulp production in tons of ODP.
 - b. Daily mass of methanol from the foul condensate stripper controlled by the thermal oxidizer.
 - c. Daily mass of MACT-regulated methanol (i.e., excluding methanol from the H2 clean condensate system) collected into the closed vent recycle system.
 - d. Daily mass of MACT-regulated methanol controlled by recycling to the closed vent pulping systems.
 - e. Daily total mass of MACT-regulated methanol from pulping process condensates collected.
 - f. Daily total mass of MACT-regulated methanol from pulping process condensates controlled.
 - g. Daily and 60-day rolling average MACT-regulated methanol collected per ton of ODP.
 - h. Daily and 60-day rolling average MACT-regulated methanol controlled per ton of ODP.
50. Provide a narrative description of the factors that contribute to variation in the methanol content of pulping condensates. These factors can be operational (e.g., the type of wood being pulped) or external (e.g., the ambient temperature).
51. Provide all records documenting testing and characterization of Kraft pulping condensates, including H2 clean condensates. Include a description of the date, sampling and measurement protocols, and the results of each test. For each time that condensate was sampled, provide a quantitative description of the mill's operating conditions at the time of sampling. Include any factors that may be relevant to the methanol content of the pulping condensates.
52. Provide the dates and results of all tests that evaluated the performance of the Foul Condensate Stripper.

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53. For the period from January 1, 2009, to the Present, provide copies of reports documenting annual leak testing of all condensate collection tanks. Include the date and result of each test.
54. For the individual drain system used to collect Kraft pulping condensates, provide the following information.
 - a. Submit a copy of the site-specific inspection plan required under 40 C.F.R. § 63.965(a)(1).
 - b. Provide documentation of annual inspections of system components required under 40 C.F.R. § 63.964(a) for the time period from January 1, 2009, to the Present.
 - c. For each time that a defect was detected, describe and provide documentation of all repair efforts made and corrective actions taken. Identify the date the defect was discovered and the dates of repair efforts and corrective actions.

Recovery Boilers

55. For the time period from January 1, 2009, to the Present, provide continuous opacity monitoring system (COMS) data for the each recovery boiler in six-minute averages. Provide the data in electronic spreadsheet format.
56. For the time period from July 1, 2008, to the Present, identify the date, time, and duration of all periods during which the recovery boiler COMS was out of control (as defined at 40 C.F.R. § 63.8(c)(7)(i)) and describe the corrective actions taken.
57. Provide the dates and results of all performance tests which evaluated the magnitude of particulate matter (PM) emissions from each recovery boiler. Include a description of the test methods used.

Smelt Dissolving Tanks

58. For the time period from January 1, 2009, to the Present, provide daily records of the black liquor solids firing rates in tons per day per tank. Provide the records in electronic spreadsheet format.
59. For the time period from January 1, 2009, to the Present, provide the following information by tank in electronic spreadsheet format. Provide data points for each 15 minute period as well as three-hour average values.
 - a. Smelt dissolving tank scrubber pressure drop.
 - b. Smelt dissolving tank scrubber liquid flow rate.
60. Provide the dates and results of all performance tests which evaluated the magnitude of PM emissions from each smelt dissolver tank. Include a description of the test methods used.

Lime Kilns

61. For the time period from January 1, 2009, to the Present, provide records of the calcium oxide production rate of each lime kiln in tons per day. Provide the records in electronic spreadsheet format.

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62. For the time period from January 1, 2009, to the Present, indicate the dates and times that each lime kiln was firing natural gas and the dates and times that each Lime Kiln was firing oil. Provide the records in electronic spreadsheet format.
63. For the time period from January 1, 2009, to the Present, provide COMS data for each lime kiln. Provide the data in electronic spreadsheet format and report six-minute average values.
64. For the time period from January 1, 2009, to the Present, identify: the date, time, and duration of all periods in which the lime kiln COMS was out of control (as defined at 40 C.F.R. § 63.8(c)(7)(i)) and describe the corrective actions taken.
65. Provide the dates and results of all performance tests which evaluated the magnitude of PM emissions from any lime kiln. Include a description of the test methods used.

MACT General

66. Provide copies of all Notifications of Compliance Status submitted by you to fulfill your obligations under 40 C.F.R. § 63.9(h), for the standards at 40 C.F.R. Part 63, Subparts S and MM.
67. Provide copies of the Monthly Air Monitoring Reports submitted by you for the time period from January 1, 2009, to the Present.
68. If your source is using the MACT MM "bubble" option (found at 40 C.F.R. § 63.862(a)(1)(ii)), answer the following questions.
 - a. Provide the limit and calculation of the limit under 40 C.F.R. § 63.865(a)(1).
 - b. Provide the limits for each Unit, and the calculation of those Units limits under 40 C.F.R. § 63.865(a)(2). Provide the limits in All Relevant Units for each Unit.
 - c. Have the limits ever been recalculated? If so, for what reason. Provide each version of the calculations and an explanation of each change.
 - d. Has any control device been modified according to 40 C.F.R. § 63.862 since the compliance date of the MACT?